

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

THE ESTATE OF NENA CHARLEY,  
by and through Personal Representative,  
TIMOTHY CHARLEY, TIMOTHY  
CHARLEY, as parent and next friend of  
NILE CHARLEY, and TIMOTHY CHARLEY, Individually,

Plaintiffs,

vs.

Cause No. 1:22-cv-00033-JB-JFR

THE UNITED STATES OF AMERICA, ROBIN  
RANELL SALES, R.N., JOELLE CATHERIN  
CERO GO, R.N., AB STAFFING SOLUTIONS,  
LLC, a Foreign Corporation, NEXT MEDICAL  
STAFFING, a Foreign Corporation, and JOHN or  
JANE DOE Corporation,

Defendants.

**PLAINTIFFS' EXPERT WITNESS DISCLOSURE**

COME NOW Plaintiffs, by and through their attorneys of record, Curtis & Co. Law Firm, and pursuant to the Court's Order Granting Unopposed Motion to Extend Amended Scheduling Order Deadlines (Doc. 143) and Fed. R. Civ. P. 26, disclose the following expert witnesses they may call at trial as follows:

1. **David Glaser, M.D.**  
2167 S. Fillmore Street  
Denver, Colorado 80210

See Curriculum Vitae, list of publications, list of prior testimony, fee schedule, and Rule 26(a)(2)(B) Report attached as Exhibit "1" produced to Defendants.

Dr. Glaser is expected to testify in accordance with his Rule 26(a)(2)(B) Report.

2. **Brian McDonald, Ph.D.**  
4219 Coe Drive N.E  
Albuquerque, New Mexico 87110

See Curriculum Vitae, list of publications, list of prior testimony, fee schedule, and Rule 26(a)(2)(B) Report attached as Exhibit “2” produced to Defendants.

Dr. McDonald is expected to testify in accordance with his Rule 26(a)(2)(B) Report.

3. **Bruce W. Polsky, M.D., M.A.C.P., F.I.D.S.A.**  
222 Station Plaza North, Suite 509  
Mineola, LI, New York 11501

See Curriculum Vitae, list of publications, list of prior testimony, fee schedule, and Rule 26(a)(2)(B) Report attached as Exhibit “3” produced to Defendants.

Dr. Polsky is expected to testify in accordance with his Rule 26(a)(2)(B) Report.

4. **Edward Shradar, R.N., M.S.N., C.E.N.**  
4390 Conejo Drive  
Danville, CA 94506

See Curriculum Vitae, list of publications, list of prior testimony, fee schedule, and Rule 26(a)(2)(B) Report attached as Exhibit “4” produced to Defendants.

Mr. Shradar is expected to testify in accordance with his Rule 26(a)(2)(B) Report.

5. Plaintiffs reserve the right to further identify additional expert witnesses named in any additional field of expertise identified by Defendants.

6. Plaintiffs reserve the right to identify additional experts to achieve parity of numbers of witnesses identified by Defendants.

7. Discovery in this case has not yet been completed. Therefore, Plaintiffs reserve the right to disclose additional expert witnesses whose identity is not reasonably foreseeable at the time of this submission as well as supplement expert reports.

8. Plaintiffs’ Experts reserve the right to amend and/or supplement their opinions as additional facts and evidence become available.

Respectfully submitted,

*Attorneys for Plaintiff*

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*Electronically signed*  
/s/ Melanie L. Ben  
Lisa K. Curtis  
Melanie L. Ben

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of July, 2023, I electronically mailed the foregoing to all counsel of record.

/s/ Melanie L. Ben  
Melanie L. Ben, Esq.